



UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

RONARD H. KEAL and
DEBORAH A. KEAL
(Name of Plaintiff)

3:10-CV-05352 RJB

vs.

CIVIL RIGHTS COMPLAINT
BY A PRISONER UNDER 42
U.S.C. § 1983

Deputy Kevin DAVID FRIES, Pierce
County Sheriff's Department, City
OF TACOMA, Pinnacle Realty, and/
OR all municipalities in individual and
(Names of Defendants) OFFICIAL CAPACITY et. al. seq.

I. Previous Lawsuits:

A. Have you brought any other lawsuits in any federal court in the United States while a prisoner:
☒ Yes ☐ No

B. If your answer to A is yes, how many?: 2 Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff Department of Corrections
Defendants RONARD and DEBORAH KEAL

2. Court (give name of District)

Western District

3. Docket Number

V/K

4. Name of judge to whom case was assigned

J Kelley Arnold

5. Disposition (For example: Was the case dismissed as frivolous or for failure to state a claim? Was it appealed? Is it still pending?)

Dismissed

6. Approximate date of filing lawsuit

V/K

7. Approximate date of disposition

V/K

II. Place of Present Confinement:

AJ

A. Is there a prisoner grievance procedure available at this institution?

☐ Yes

☒ No

B. Have you filed any grievances concerning the facts relating to this complaint?

☒ Yes

☒ No

If your answer is NO, explain why not

C. Is the grievance process completed?

☒ Yes

☐ No

If your answer is YES, ATTACH A COPY OF THE FINAL GRIEVANCE RESOLUTION for any grievance concerning facts relating to this case.

III. Parties to this Complaint

A. Name of Plaintiff:

RONALD KEAL and DEBORAH A. KEAL

Address:

2011 E. 57th St., Tacoma, WA 98404

(In Item B below, place the full name of the defendant, his/her official position, and his/her place of employment. Use item C for the names, positions and places of employment of any additional defendants. Attach additional sheets if necessary.)

B. Defendant

Deputy KEVIN DAVID FRIES

official position

Deputy Sheriff

place of employment

PIERCE COUNTY SHERIFF'S DEPARTMENT

C. Additional defendants

Pierce County Sheriff's Department
City of Tacoma, Pinnacle Realty, and/or
All municipalities in there ~~as~~ individual and
OFFICIAL CAPACITIES.

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates, places, and other persons involved. Do not give any legal arguments or cite any cases or statutes. If you allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets if necessary.)

- 1) on or about MAY 18, 2007 Pierce County ~~sher~~^{8K} Deputy Sheriff KEVIN DAVID FRIES did Assault Ronald H. KEAL and DEBORAH A. KEAL by, A) grabbing MR KEAL B) Placing his feet in DARS. KEAL'S Door and pushing his way in, knocking her against a legal desk. C) unlawfully TASERING MR KEAL TEN TIMES w/ high voltage at point BLANK RANGE in the heart and THEREAFTER, PRESSING THE TASER AGAINST his body, NINE MORE TIMES (EVEN in his SCROTUM) Also pulling his hair out while punching and kneeling him. w/ RACIAL slurs "NIGGER."
- D) ENTERING THE PREMISES w/out A WARRANT AND ARRESTING both DEFENDANTS while working off duty. FOR Pinnacle Realty AS A Security guard w/out Authorization from his Employer.
- E) unlawfully ARRESTING both DEFENDANTS.
- F) Pinnacle Realty who's LEASE RESTRICTS MOVEMENT SCREENING PROCESS SELECTIVELY / RACIALLY DISCRIMINATED AGAINST MR. KEAL due to criminal history when most occupants were felons (EVEN DEBORAH A. KEAL'S SON ISAAC YEAGER who ALSO RESIDED THERE).

MR KEAL has subsequently SUFFERED neurological, pulmonary, CARDIAC, and other physical and DAMAGE CAUSED by DEFENDANTS UNLAWFUL ACTS

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

I would like the Court to Award 1) Compensatory Damages of 2.8 million dollars 2) Punitive Damages 45,000 thousand Dollars 3) Nominal Damages of 50,000 thousand Dollars And any/or other Categories deemed by the Court

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 17th day of MAY, 2010


wcc 1-308 and
(Signature of Plaintiff)
FER: Deborah A. R...